

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE CLERK  
Docket No. C99-1

COMPLAINT ON POST E.C.S.

RESPONSE OF UNITED STATES POSTAL SERVICE TO  
ANSWERS OF THE COALITION AGAINST UNFAIR USPS COMPETITION AND  
UNITED PARCEL SERVICE IN RESPONSE TO MOTION  
OF THE UNITED STATES POSTAL SERVICE  
FOR RECONSIDERATION, OR FOR ALTERNATIVE RELIEF  
(March 15, 1999)

On March 9, the Coalition Against USPS Competition (CAUUC) and United Parcel Service (UPS) filed Answers to the Postal Service's Motion for Reconsideration, or for Alternative Relief, in this docket. In their Answers, UPS and CAUUC essentially state, in part, that it is not necessary for the Commission to require the production of agreements responsive to question 4(a) posed in Order No. 1229 in order to resolve the Postal Service's pending motion to dismiss. On this point, no participant in this proceeding has expressed disagreement.

UPS and CAUUC suggest, however, that if the Commission is not inclined to deny the Postal Service's motion to dismiss, the parties be permitted to conduct discovery on the Postal Service. To the extent that the Commission considers these to be requests for relief, the Postal Service does not intend that the Commission consider them to be unopposed. For the jurisdictional and substantive reasons offered in its Motion to Dismiss and its Motion for Reconsideration, the Postal Service submits that discovery in this docket is

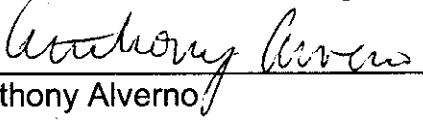
inappropriate. In order to preserve its objections, the Postal Service hereby expresses its opposition to any request for discovery in this docket.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:  
Daniel J. Foucheaux, Jr.

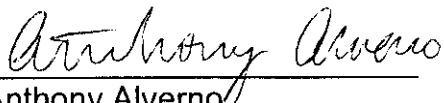
Chief Counsel, Ratemaking

  
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March 15, 1999

### CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
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March 15, 1999